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**BEFORE THE
RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. R-2039

DEBRA LUDLOW
P.O. Box 504
Forest Ranch, CA 95942

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

Respiratory Care Practitioner License No. 10111
Respondent.

IT IS HEREBY STIPULATED AND AGREED by and between the parties in this proceeding that the following matters are true:

PARTIES

1. Stephanie Nunez (Complainant) is the Executive Officer of the Respiratory Care Board of California. She brought this action solely in her official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by Catherine E. Santillan, Senior Legal Analyst.

2. Debra Ludlow (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about March 10, 1986, the Respiratory Care Board of California issued Respiratory Care Practitioner License No. 10111 to Debra Ludlow (Respondent). The License was in full force and effect at all times relevant to the charges brought in Accusation No.

1 R-2039 and will expire on July 31, 2007, unless renewed.

2 JURISDICTION

3 4. Accusation No. R-2039 was filed before the Respiratory Care Board
4 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The
5 Accusation and all other statutorily required documents were properly served on Respondent on
6 July 19, 2006. Respondent timely filed her Notice of Defense contesting the Accusation. A copy
7 of Accusation No. R-2039 is attached as Exhibit A and incorporated herein by reference.

8 ADVISEMENT AND WAIVERS

9 5. Respondent has carefully read, and understands the charges and allegations
10 in Accusation No. R-2039. Respondent also has carefully read, and understands the effects of
11 this Stipulated Surrender of License and Order.

12 6. Respondent is fully aware of her legal rights in this matter, including the
13 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
14 counsel, at her own expense; the right to confront and cross-examine the witnesses against her;
15 the right to present evidence and to testify on her own behalf; the right to the issuance of
16 subpoenas to compel the attendance of witnesses and the production of documents; the right to
17 reconsideration and court review of an adverse decision; and all other rights accorded by the
18 California Administrative Procedure Act and other applicable laws.

19 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
20 each and every right set forth above.

21 CULPABILITY

22 8. Respondent admits the truth of each and every charge and allegation in
23 Accusation No. R-2039, agrees that cause exists for discipline and hereby surrenders her
24 Respiratory Care Practitioner License No. 10111 for the Board's formal acceptance.

25 9. Respondent understands that by signing this stipulation she enables the
26 Board to issue an order accepting the surrender of her Respiratory Care Practitioner License
27 without further process.

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1 and all of the charges and allegations contained in Accusation No. R-2039 shall be deemed to be
2 true, correct and admitted by Respondent when the Board determines whether to grant or deny
3 the petition.

4 16. Respondent shall pay the Board its costs of investigation and enforcement
5 in the amount of \$1,010.00 prior to issuance of a new or reinstated license.

6 ACCEPTANCE

7 I have carefully read the Stipulated Surrender of License and Order. I understand
8 the stipulation and the effect it will have on my Respiratory Care Practitioner License. I enter
9 into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and
10 agree to be bound by the Decision and Order of the Respiratory Care Board.

11 DATED: September 8, 2006

12
13 Original signed by:
14 Debra Ludlow
Respondent

15
16 ENDORSEMENT

17 The foregoing Stipulated Surrender of License and Order is hereby respectfully
18 submitted for consideration by the Respiratory Care Board of the Department of Consumer
19 Affairs.

20 DATED: September 8, 2006

21
22 BILL LOCKYER, Attorney General
23 of the State of California

24
25 Original signed by:
CATHERINE E. SANTILLAN
26 Senior Legal Analyst

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RESPIRATORY CARE BOARD
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In the Matter of the Accusation Against:

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DEBRA LUDLOW
P.O. Box 504
Forest Ranch, CA 95942

Respiratory Care Practitioner License No. 10111

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Respiratory Care Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 30, 2006.

It is so ORDERED October 19, 2006.

Original signed by:
LARRY L. RENNER, BS, RRT, RCP, RPFT
PRESIDENT, RESPIRATORY CARE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA